

STATEMENT OF FACTS

5:21mj1142

1. Your affiant, Timothy M. Alvord, is a Special Agent of the Federal Bureau of Investigation. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of a violation of Federal criminal laws.

2. The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

Incursion at the U.S. Capitol on January 6, 2021

3. On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

4. As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

5. At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, shortly around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

6. Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

7. During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

Facts Specific to JOHN DOUGLAS WRIGHT

8. Following the January 6, 2021 attack on the Capitol, your affiant received and reviewed multiple tips submitted by members of the public.

9. Four cooperating witnesses (“CW1”, “CW2”, “CW3” and “CW4”) separately reported that JOHN DOUGLAS WRIGHT (“WRIGHT”) participated in the protest at the Capitol on January 6, 2021.

10. CW1 was aware of WRIGHT’s participation from admissions made by WRIGHT to CW1. CW1 has known WRIGHT for 19 years, and confirms that the individual heard in Facebook video posts from account doug.wright.108 that were posted from inside and outside the Capitol, is in fact WRIGHT.

11. CW2 reported to the FBI that he/she viewed Facebook comments by WRIGHT, which were made to a Facebook page of CW2’s Facebook “friend”, which indicated that WRIGHT made it inside the Capitol Building and was “beat up.”

12. CW3 and CW4 were aware of WRIGHTS’s participation because WRIGHT posted video on his public Facebook account *doug.wright.108*. CW3 and CW4 reported that video from January 6, 2021 depict WRIGHT’s Facebook page broadcasting live video he took from inside the Capitol. CW3 has known WRIGHT for four years and confirm that the individual shown in Facebook posts from account doug.wright.108 that were posted from inside the Capitol, is in fact WRIGHT. CW4 does not know WRIGHT but was able to view the video because a Facebook “friend” of CW4 shared the video of WRIGHT

13. On January 7, 2021, the Canton Repository newspaper published a story about WRIGHT’s attendance at the January 6th Washington DC protest. During the interview, WRIGHT stated that he was “beaten up by the cops” and “Yesterday wasn’t the end. Yesterday was the first battle of the war. I promise you”. The following is a picture that accompanied the story:

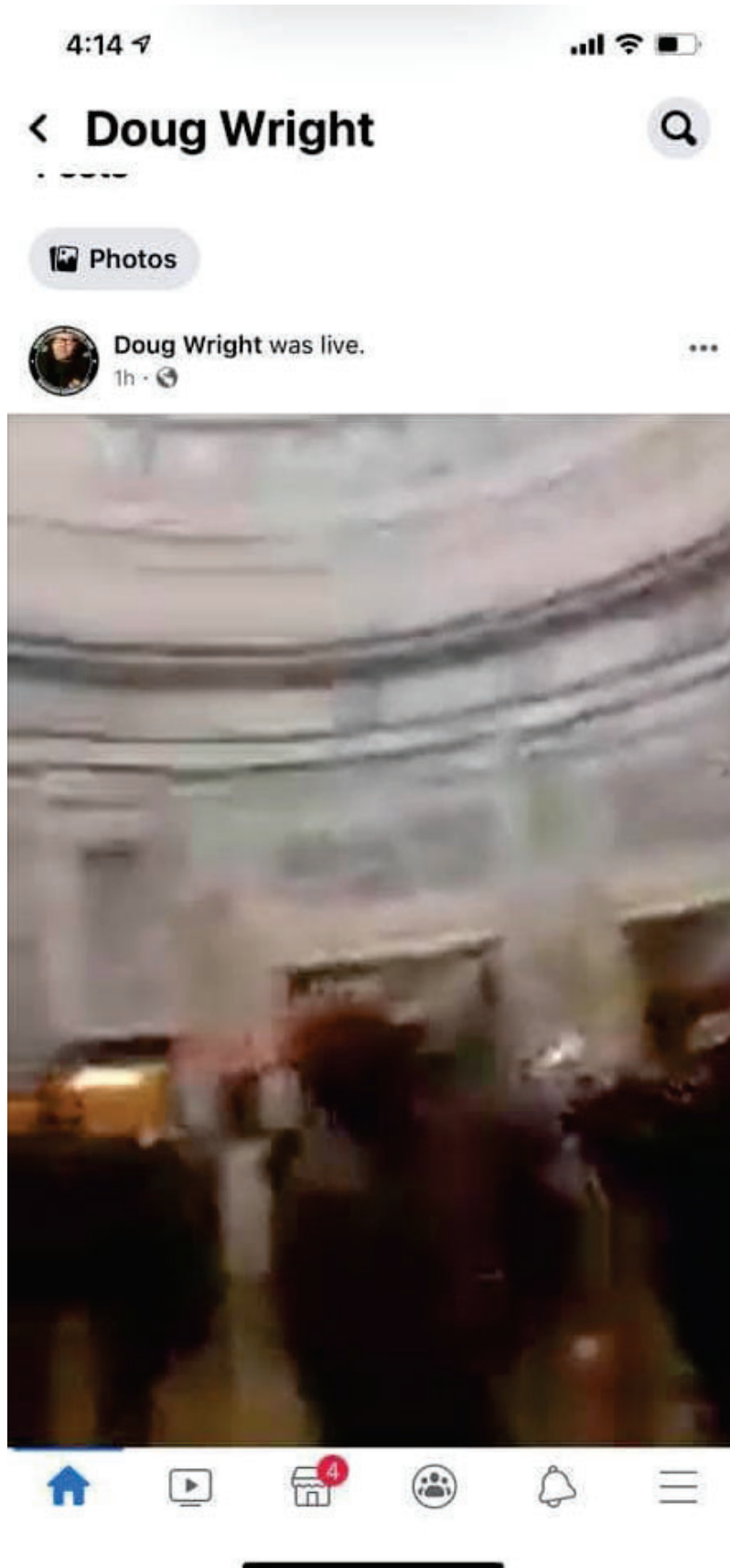


14. On January 7, 2021, CW1 reported to the FBI that WRIGHT made admissions to CW1 that he was detained inside the Capitol Building Rotunda during the riot. WRIGHT told CW1 that he was sprayed with a chemical agent and forced to the ground inside the Capitol Building. CW1 also identified the voice in video's from Facebook account doug.wright.108 as that of WRIGHT. These video's were from inside and outside the Capitol Building.

15. On January 9, 2021, CW2 reported to the FBI that he/she viewed Facebook comments by WRIGHT, which were made to a Facebook page of CW2's Facebook "friend", which indicated that WRIGHT made it inside the Capitol Building and was "beat up".

16. On January 11, 2021, CW3 reported that WRIGHT was inside the U.S. Capitol Building during the riot on January 6, 2021. CW3, who is a Facebook "friend" of WRIGHT, observed video that WRIGHT had posted to his Facebook page. This video, which was broadcast live, was from inside the Capitol Building. CW3 could not see WRIGHT in the video but was able to recognize his voice. CW3 has known WRIGHT for four years, and has met him in person, which is how CW3 is able to identify WRIGHT's voice.

17. On February 8, 2021, CW4 reported to the FBI that he/she observed video that was shared on Facebook from WRIGHTS's Facebook page of video from inside the Capitol Building. This video was from inside the Capitol Rotunda. The Facebook video was titled "Doug Wright was Live". CW4 was able to capture a screenshot of the video.



18. While personally viewing account *doug.wright.108*, your affiant observed statements made by the account user of *doug.wright.108* on January 5, 2021 in which the user states “TODAY WE TAKE GEORGIA TOMORROW WE TAKE OUR COUNTRY BACK (SOUND FAMILIAR)”.

19. While personally viewing account *doug.wright.108*, your affiant observed statements made by the account user of *doug.wright.108* on January 7, 2021 in which the user states “YESTERDAY WAS A PRACTICE RUN”.

20. On January 7, 2021, a review of Facebook account *doug.wright.108*, affiant observed a video, captioned “Doug Wright was Live”. This video was posted on January 6, 2021 at 2:16 pm. This video depicted a crowd near the US Capitol Building. A voice was shouting “We are in the house. All we got to do is get the door down now. We’re gonna drag their stupid asses out”.

21. On January 7, 2021, a review of Facebook account *doug.wright.108*, affiant observed a video, captioned “Doug Wright was Live”. This video was posted on January 6, 2021 at 2:19 pm. This video depicted a crowd near the US Capitol Building. A voice was shouting “Whose house, our house”.

22. A tip submitted to the FBI contained a video attachment of a Facebook Live video, captioned “Doug Wright was Live”. This video was from inside the US Capitol Rotunda, with an individual shouting “Yeah, this is what the inside looks like. We are in our house”.

23. On January 11, 2021, case agent interviewed WRIGHT at his residence. WRIGHT stated that he was not inside the US Capitol Building. After interviewing WRIGHT, and viewing the three Facebook videos described above, your affiant believes that the voice in all three Facebook Live videos is that of WRIGHT.

24. A review of CCTV video from the U.S. Capitol Building revealed an individual, believed to be WRIGHT, in the U.S. Capitol Building, to include the Rotunda. The individual believed to be WRIGHT is wearing the same hooded sweatshirt that he was wearing when interviewed by the Canton Repository on numerous occasions. WRIGHT also shares a photo numerous times on Facebook Messenger that depicts him shoving a police barrier. In this photo, WRIGHT is wearing the same hooded sweatshirt.



25. On March 11, 2021, a Federal Search Warrant was executed on Facebook for the account belonging to *doug.wright.108*. On March 15, 2021, results for account *doug.wright.108* were returned. During these Facebook Messenger conversations, WRIGHT reveals his premeditated intent to assault law enforcement officers, breach the US Capitol Building, commit violence on members of Congress, and participate in “war”. The following conversations were observed between WRIGHT and various individuals on Facebook Messenger (Times are in UTC):

a. Conversation between WRIGHT and Individual 1:

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 03:57:17 UTC

Body WE ARE GOING TO HAVE TO FIGHT THE BLUE TOMORROW

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:05:52 UTC

Body FROM WHAT I SEEN TONIGHT THE TEMPERS WILL BE UP
TOMORROW AND POLICE LINES WILL BE BREACHED

Author Individual 1 (Facebook: xxxx-225)

Sent 2021-01-06 04:06:46 UTC

Body They need to understand that we are serious! I think they will get the point tomorrow.

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:06:53 UTC

Body WE HAVE ENOUGH TO PUSH THRU

Author Individual 1 (Facebook: xxxx-225)

Sent 2021-01-06 04:07:02 UTC

Body I'm sure

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:07:47 UTC

Body THE FIRST MISTAKE THEY MAKE IN CHAMBERS WE ARE GOING IN
AND DRAG THEM OUT

Author Individual 1 (Facebook: xxxx-225)

Sent 2021-01-06 04:08:02 UTC

Body Georgia counties are shutting down again this is bullshit

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:08:04 UTC

Body HOPE I MAKE IT THROUGH

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-07 21:21:21 UTC

Body I AM IN RED HOODIE

b. Conversation between WRIGHT and Individual 2:

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:43:19 UTC

Body War tokorrow

Author Individual 2 (Facebook: xxxx-367)

Sent 2021-01-06 04:43:24 UTC

Body So what's next civil war

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:44:09 UTC

Body 5million pissed off patriots tomorrow

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:44:35 UTC

Body First battle

c. Conversation between WRIGHT and Individual 3:

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:27:53 UTC

Body ALMOST WAR TIME

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:28:37 UTC

Body Yep! And they are stealing the Georgia run offs as we speak 🤔

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:28:46 UTC

Body I KNOW

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:29:05 UTC

Body THAT WILL BE THE 2ND BATTLE FIELD

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:29:35 UTC

Body I believe war begins tomorrow for Trump...

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:29:47 UTC

Body FOR US

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:30:12 UTC

Body I hope he uses his executive order and arrests them all

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:30:28 UTC

Body ME TOO

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:31:34 UTC

Body You know they are gonna sneak through the tunnels instead of coming out the building. People need to find the tunnel exits and get them

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:31:57 UTC

Body DONE

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:32:10 UTC

Body ALL PLANNED OUT

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:32:37 UTC

Body I knew you was ahead of the game👍👍

d. Conversation between WRIGHT and Individual 4:

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-07 20:52:06 UTC

Body IT'S FUCKING WAR TIME

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-07 21:10:33 UTC

Body NO MORE PROTESTING

e. Conversation between WRIGHT and Individual 5:

Author Individual 5 (Facebook: xxxx-292)

Sent 2021-01-07 23:08:13 UTC

Body I love it, did you get in?

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-07 23:08:42 UTC

Body SET ON NICE BENCH IN ROTUNDA AND HAD A SMOKE

f. Conversation between WRIGHT and Individual 6:

Author Individual 6 (Facebook: xxxx-378)

Sent 2021-01-08 01:15:23 UTC

Body Are you guys planning on going back to DC

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-08 01:15:44 UTC
Body LOADED

Author Individual 6 (Facebook: xxxx-378)

Sent 2021-01-08 01:17:33 UTC
Body When do you plan on going

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-08 01:17:45 UTC
Body 17TH

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-08 01:18:04 UTC
Body I THINK WE NEED TO MAKE HOME VISITS

26. Upon receiving this information, FBI compared a known image of JOHN DOUGLAS WRIGHT obtained from the Ohio State Bureau of Motor Vehicles on approximately January 9, 2021 to images and surveillance footage obtained by law enforcement at and around the U.S. Capitol on January 6, 2021. By comparing this photograph to the surveillance footage, your affiant reasonably believes that the person is JOHN DOUGLAS WRIGHT.

27. Your affiant reviewed surveillance footage of an individual resembling JOHN DOUGLAS WRIGHT inside the U.S. Capitol Rotunda at approximately 2:40 PM. I believe JOHN DOUGLAS WRIGHT to be the individual seen in Photo 1 wearing a red hooded sweatshirt. WRIGHT is seen utilizing his cell phone in this photo. Wright was in the main Rotunda area for approximately 9 minutes 41 seconds.

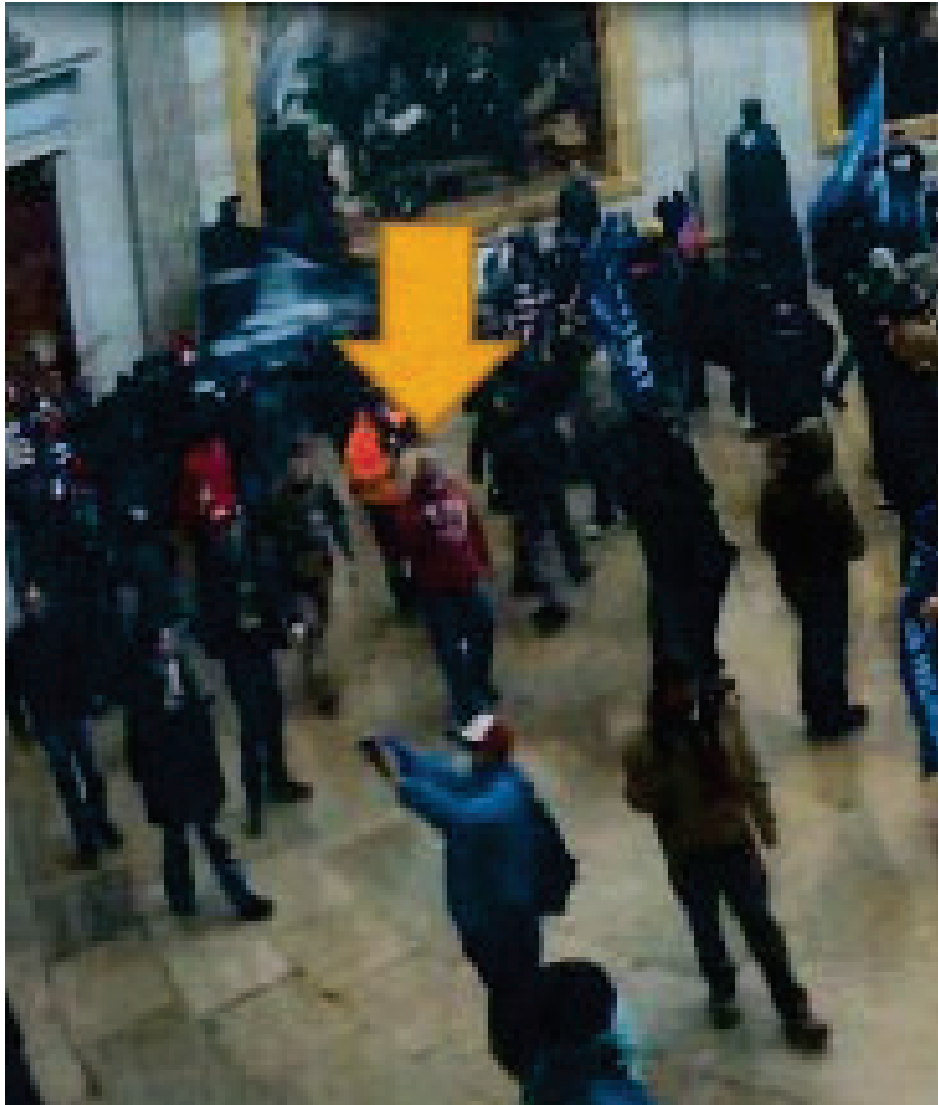


Photo 1

28. CCT Video labeled 7216 USCH 02 Rotunda Lobby East Stairs USCH 02, at approximately 2:49 PM, show WRIGHT as he looks up the stairwell in Photograph 2.

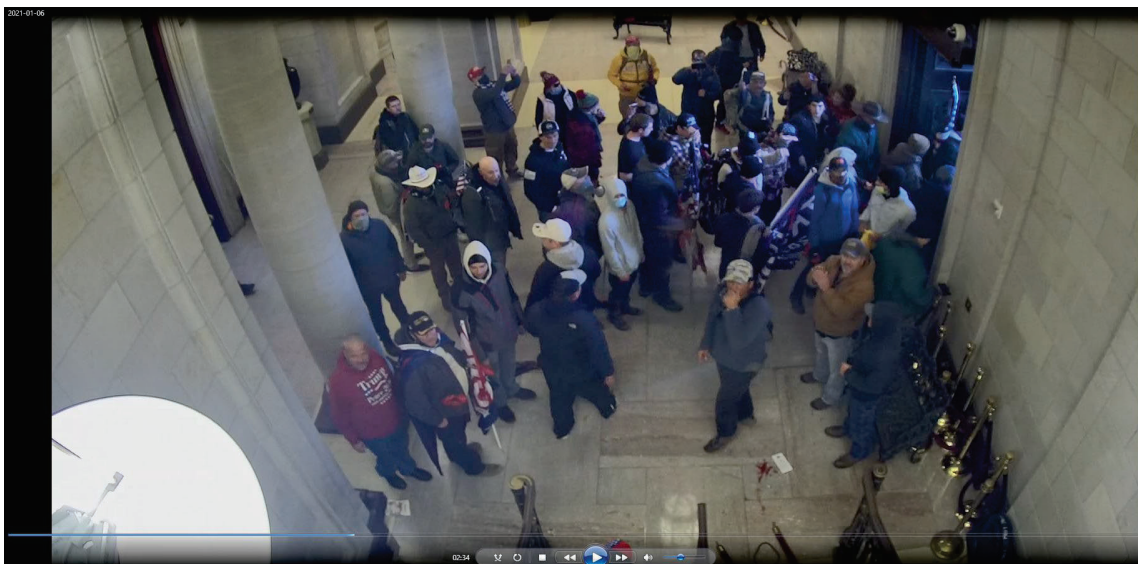


Photo 2

29. CCT Video labeled 0686 USCH 02 Rotunda Door Interior, at approximately 2:50 PM, shows WRIGHT is at the left of the screen near the stairwell in Photograph 3.



Photo 3

30. Based on my in person interview of WRIGHT, your affiant reasonable believes this Photo 4, which was taken outside the East Front of the U.S. Capitol Building on January 6, 2021, shows JOHN DOUGLAS WRIGHT.



Photo 4

31. Your affiant believes this Photo 5, which was taken outside the East Front of the U.S. Capitol on January 6, 2021, shows JOHN DOUGLAS WRIGHT holding onto a police barrier. WRIGHT is wearing the red hooded sweatshirt, with the hood pulled over his head.



Photo 5

32. After interviewing WRIGHT and comparing his physical characteristics to the individual captured on video and photographs from inside and outside the Capitol detailed above, your affiant believes that WRIGHT is the same person captured in the videos and photographs.

33. A review of Ohio Secretary of State Business Records indicate that JOHN D. WRIGHT JR. is the Agent/Registrant for the business D AND L CHARTER. This business lists an address known to your affiant in Canton, Ohio, which is the same address as WRIGHT.

34. A review of Facebook account doug.wright.108 indicate the account user's birthdate is a date known to your affiant in December 1966 (and is the same birthdate as WRIGHT), with a registered email account address as dandlcharter@att.net.

Statement of Probable Cause

35. Based on the foregoing, your affiant submits that there is probable cause to believe that JOHN DOUGLAS WRIGHT violated 18 U.S.C. § 1752(a)(1), (2) and (4), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do so; (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; and (4) knowingly engage in any act of physical violence against any person or property in any restricted building or grounds; or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a "restricted building" includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

36. Your affiant submits there is also probable cause to believe that JOHN DOUGLAS WRIGHT violated 40 U.S.C. § 5104(e)(2)(D) & (G), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.

37. Your affiant submits there is probable cause to believe that JOHN DOUGLAS WRIGHT violated 18 U.S.C. 231(a)(3), which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of Section 231 of Title 18, a federally protected function means any function, operation, or action carried out, under the laws of the United States,

by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Joint Session of Congress where the Senate and House count Electoral College votes.

38. Your affiant submits there is probable cause to believe that JOHN DOUGLAS WRIGHT violated 18 U.S.C. § 1512(c)(2), which makes it a crime to obstruct, influence, or impede any official proceeding, or attempt to do so. Under 18 U.S.C. § 1515, congressional proceedings are official proceedings.

39. Finally, your affiant submits there is probable cause to believe that JOHN DOUGLAS WRIGHT violated 18 U.S.C. § 1001, which makes it a crime to willfully make a materially false statement in a matter within the jurisdiction of the executive branch of the Government of the United States.

A handwritten signature in black ink, appearing to read "Tim M. Alvord", written over a horizontal line.

TIMOTHY M. ALVORD
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone, this 26th day of April 2021.

A handwritten signature in black ink, appearing to read "Robin M. Meriweather", written over a horizontal line.

ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE